

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**In Re:**

**John C Hill III  
Naomi L Hill**

**Debtors**

**Case No. 13-13406-JDL  
Chapter 13**

**DEBTOR'S RESPONSE TO THE TRUSTEE'S  
OBJECTION TO CLAIM NUMBER 6, and  
REQUEST FOR COMPENSATION**

COMES NOW the above named Debtors and for Response to the Trustee's Objection to Claim #6, respectfully states:

1. That Debtors want Claim #6 fully paid as the same is co-signed by Debtor's father.
2. That the Debtors are contacting the Creditor to determine why Trustee alleges that Creditor is not accepting payments from the Trustee.

WHEREFORE, Debtors pray that the Trustee's Objection be denied, that Debtor's attorney be allowed a \$500.00 attorney fee without the necessity of submitting time records, which shall be an administrative claim in this case and shall be paid at the rate of not less than \$75.00 per month through the Plan, and for such other relief as this Court deems appropriate.

Respectfully Submitted,

/s/ Kenneth C. McCoy

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Attorney for Debtors

13-0029

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the date of its filing a true and correct copy of this pleading was:

1. Electronically transmitted to the following listed parties by the Court's CM/ECF electronic noticing system:

- Gary C Barton gary.c.barton@irscounsel.treas.gov
- John T. Hardeman 13trustee@chp13okc.com, trustee@chp13okc.com
- Robert J Hauge bhauge15@gmail.com, bmyers@baer-timberlake.com;kjones@baer-timberlake.com
- Kenneth Clay McCoy kmccoy\_aba@yahoo.com, kmccoyaba@gmail.com
- Sean R McFarland bankruptcy@tax.ok.gov
- Julie H Thomas jthomas@kivell.com, mgeorge@kivell.com
- U.S. Trustee Ustpreion20.oc.ecf@usdoj.gov

2. Mailed with proper postage prepaid thereon to the following:

John & Naomi Hill  
716 N Briarcliff Dr  
Moore, OK 73170

US Bank Trust NA  
c/o Selene Finance  
9990 Richmond Ave STE 400  
Houston, TX 77042

Julie Hird Thomas  
Kivell Rayment & Francis PC  
7666 E 61<sup>st</sup> Street STE 550  
Tulsa, OK 74133

/s/ Kenneth C. McCoy  
Kenneth C. McCoy, OBA #5926  
Attorney for Debtors 13-0029